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JASON EDWARD THOMAS CARDIFF

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12 UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

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UNITED STATES OF AMERICA,
Plaintiff,
vs.
JASON EDWARD THOMAS
CARDIFF,
Defendant.

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Case No. 5:23-cr-00021-JGB

**JASON CARDIFF'S EX PARTE
APPLICATION TO: (1) CONTINUE
AND CONSOLIDATE HEARINGS
ON PENDING MOTIONS AND (2)
LEAVE OF COURT TO ALLOW
JASON CARDIFF'S
PARTICIPATION BY VIDEO**

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I. CONTACT INFORMATION FOR OPPOSING COUNSEL

24 Valerie Makarewicz
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2 Manu J. Sebastian
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5 Washington, DC, 20001-2739
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7 **II. APPLICATION**

8 Defendant, Jason Cardiff requests that the Court consolidate and combine
9 hearings on the Government's Motion to Forfeit Bail and for Summary Adjudication
10 set for March 3, 2025 at 2:00 p.m. with Defendant's Motion to Compel Production of
11 Extradition File and Related Communications set for March 10, 2025 at 2:00 p.m.
12 Counsel for Defendant sought concurrence in this cost saving measure on February 14,
13 20215 was told that the Government was unable to accommodate scheduling a hearing
14 on its motion for 7 days. Counsel previously conferred with Government counsel
15 regarding video conference participation by Mr. Cardiff, which was opposed. The
16 Court previously denied Mr. Cardiff's participation.

17 **POINTS AND AUTHORITIES**

18 Counsel for Defendant is located in Houston, Texas and one of the Government's
19 attorneys is in Washington, D.C.

20 Federal Rule of Procedure 1 provides that the rules should be construed and
21 administered by the courts and parties to secure the just, speedy and inexpensive
22 determination of every action and proceeding. The refusal to consolidate the two
23 motions for a hearing date on March 10, 2025 imposes unnecessary costs on all parties.

24 Mr. Cardiff requests that he be allowed to participate and attend the hearings by
25 video conference. F.R. Crim. P. 43. Defendant recognizes that the Court
26 previously denied a request due to his absence but respectfully requests that the Court
27 grant permission for these motions.

1 WHEREFORE, Defendant requests that: (1) the Government's Motion to
2 Forfeit Bail and for Summary Adjudication and Defendant's Motion to Compel
3 Production of Extradition File and Related Communications be consolidated and set
4 for March 10, 2025 at 2:00 p.m.; and that (2) Jason Cardiff be allowed to participate
5 by phone for the two pending motions.

6 || Dated: February 24, 2025

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By: /s/ Stephen R. Cochell

Stephen R. Cochell

10 Attorney for Defendant
11 JASON EDWARD THOMAS CARDIFF

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1 **SERVICE LIST**

2 I HEREBY DECLARE THAT THE FOLLOWING COUNSEL HAVE BEEN
3 SERVED WITH THIS DEFENDANT JASON CARDIFF'S NOTICE OF MOTION
4 AND MOTION TO SUPPRESS EVIDENCE THROUGH THE COURT'S ECF OR
NEXT GEN ELECTRONIC FILING SYSTEM:

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6 States Attorney Mack E.
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17 */S/ Stephen R. Cochell*
18 Stephen R. Cochell

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